BLANCHARD, WALKER, O'QUIN & ROBERTS

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> > November 14, 2003

Newton C. Blanchard (1922)
ELIAS GOLDSTEIN (1962)
HENRY C. WALKER (1963)
ARTHUR O'QUIN (1972)
WILTON H. WILLIAMS, JR. (1975)
LEON O'QUIN (1979)
JOSEPH W. MILNER (1989)
ROBERT ROBERTS, JR. (1991)
CLYDE W. THURMON (1992)
PIKE HALL, JR. (1999)
MARLIN RISINGER. JR. (2002)

Of Counsel Gilbert L. Hetherwick Robert Roberts III Neilson S. Jacobs

Honorable James H. Welsh Commissioner of Conservation State of Louisiana Post Office Box 94275 Baton Rouge, Louisiana 70804-9275

Re: HEAR

**HEARING APPLICATION** 

Hosston Formation, Reservoir A

Cotton Valley Formation, Reservoir A

Holly Field

DeSoto Parish, Louisiana

Our File No. 370306.0027 #2

Dear Sir:

JOHN T. COX, JR.

J. David Garrett Cecil W. Talley

GARY H. LOVE

W. Michael Adams Wm. Timothy Allen III

M. Thomas Arceneaux Robert W. Johnson Paul M. Adrins

LESLIE IDOM KALMBACH

F. Michael Carmody Kimberly D. Belanger

CLINTON S. SIMON

REGINALD E. CASSIBRY, P.C.

On behalf of PINNACLE OPERATING COMPANY, INC., application is hereby made for a public hearing to receive evidence concerning the issuance of an order pertaining to the following matters relating to the Hosston Formation, Reservoir A and the Cotton Valley Formation, Reservoir A, in the Holly Field, DeSoto Parish, Louisiana:

- 1. To permit the applicant to drill, designate and utilize the Pinnacle Operating Co., Inc.-Burford Estate 1-Alt Well and the Pinnacle Operating Co., Inc.-Pure Resources, et al No. 1-Alt.Well, at the exceptional locations shown on the plat attached hereto, and to designate said wells as alternate unit wells for HOSS RA SU20 and CV RA SUC, respectively, in exception to the well spacing provisions of Office of Conservation Order 88-D, effective February 1, 1975 and Order No. 88-E, effective August 1, 1975.
- 2. To explicitly find that the abovesaid wells are necessary to drain portions of the Hosston Formation, Reservoir A, and Cotton Valley Formation, Reservoir A, in the Holly Field underlying HOSS RA SU20 and CV RA SUC, respectively, which cannot be efficiently and economically drained by any existing well in such units.
- 3. To provide that the unit allowable for said units may be produced from either the substitute unit well, the alternate unit wells or any combination thereof, at operator's discretion
- To consider such other matters as may be appropriate and justified by the evidence presented at the hearing.

Conservation Commissioner November 14, 2003 Page 2

presented at the hearing.

The Hosston Formation, Reservoir A, in the Holly Field, DeSoto Parish, Louisiana, was fully defined in Office of Conservation Order No. 88-D, effective February 1, 1975.

The Cotton Valley Formation, Reservoir A, in the Holly Field Field, DeSoto Parish, Louisiana, was fully defined in Office of Conservation Order No. 88-E, August 1, 1975.

The Rules of Procedure of the Commissioner of Conservation pertaining to the Pre-Application Notice requirements, are not applicable to the hearing requested herein, which requires legal notice of only ten (10) days.

Pertinent data concerning the intended application will be made available for inspection at the offices of David Benscoter, c/o Long Petroleum, Bank One Tower, Suite 800, 400 Texas Street, Shreveport, LA 71101. Any person wishing to inspect such data should call Mr. Dave Benscoter (318) 221-3516 during normal business hours or write Mr. Benscoter at the above address, in order to arrange a date and time for such inspection. A copy of any such pertinent data can be obtained at the expense of the requesting party.

A list of the names and addresses of all Interested Owners, Represented Parties and Interested Parties (as defined in the Rules of Procedure) is attached hereto, and a copy of this notice, with the annexed plats, is being sent to each of such persons. A reasonable effort has been made to determine that the enclosed list includes all of the persons to whom this notice must be sent under the Rules of Procedure.

A check in the amount of \$1,510.00 made payable to the Commissioner of Conservation is enclosed herewith as the statutory fee for holding the requested hearing.

This application is being filed in duplicate, and a copy hereof is being sent to Mr. James C. Broussard, Shreveport District Manager of the Office of Conservation and to each Interested Owner, Represented Party and Interested Party whose name is shown on the attached list.

Very truly yours,

BLANCHARD, WALKER, O'QUIN & ROBERTS

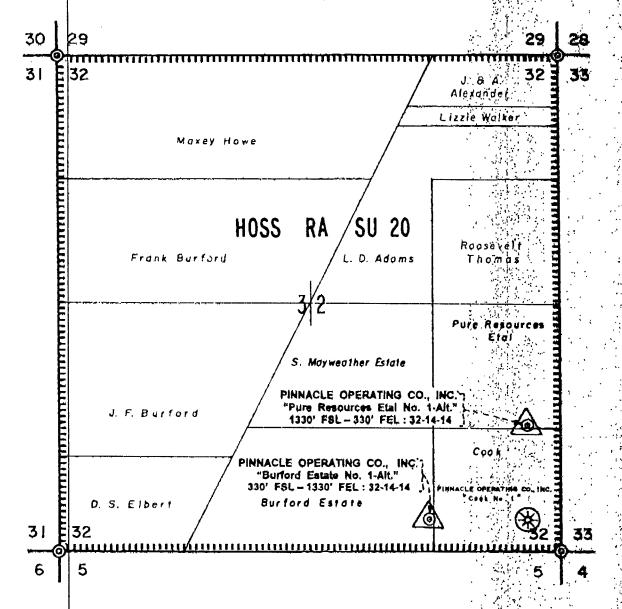
WTAIII/bp Enclosures

Wm. Timothy Allen III

Attorneys for Pinnacle Operating Company, Inc.

cc: Mr. James C. Broussard, Shreveport District Manager,
Office of Conservation (w/enclosures)
Interested Owners, Represented Parties
and Interested Parties (w/copy of plats only)

SECTION 32, TOWNSHIP 14 NORTH, RANGE 14 WEST



Docket No.

Order No.

PINNACLE OPERATING CO., INC.

PLAT SHOWING

PROPOSED ALTERNATE UNIT WELLS FOR

HOSS RA SU 20

HOLLY FIELD

DESOTO PARISH, LOUISIANA

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Date: November 14, 2003

Scale: 1" = 1000



= SUBSTITUTE UNIT WELL



= PROPOSED ALTERNATE UNIT WELL

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DeSOTO PARISH, LOUISIANA. 30 29 .31 32 32 V. 8 A. Alexander Lizzie Walker Maxey Hawa CV RA SU Roosevelt Frank Burlord L. D. Adams Thomas ure Resources Ejai: S. Mayweather Estate PINNACLE OPERATING CO., INC. "Pure Resources Etal No. 1-Att." 1330' FSL - 330' FEL: 32-14-14 J. F. Burford Cook PINNACLE OPERATING CO., INC. "Burford Estate No. 1-Alt." )
330' FSL - 1330' FEL : 32-14-14 31 2 32 D. S. Elbert Burford Estate

32, TOWNSHIP 14 NORTH, RANGE

Docket No.

Order No.

PINNACLE OPERATING CO., INC.

14 WEST,

PLAT SHOWING

PROPOSED ALTERNATE UNIT WELLS FOR

CV RA SUC

HOLLY FIELD

DESOTO PARISH, LOUISIANA

Date: November 14, 2003

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= SUBSTITUTE UNIT WELL

SECTION



F PROPOSED ALTERNATE UNIT WELL

TITITUTE EXISTING UNIT

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\*Soale : 1" = 1000'